

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

STACY HILL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

FISHER AND SHAPIRO, LLC and DOES 1-20,

Defendants.

JURY TRIAL DEMANDED

No.

PLAINTIFF'S MOTION FOR CLASS CERTIFICATION

NOW COMES Plaintiff Stacy Hill, individually and on behalf of all others similarly situated, by her attorneys, and as for her Motion for Class Certification, states as follows:

1. Plaintiff respectfully requests that the Court certify the following Class pursuant to Fed. R. Civ. Pr. 23:

All persons named as a defendant in a foreclosure lawsuit containing an affidavit altered by Fisher and Shapiro, LLC, one of its agents, or a Doe Defendant.¹

Excluded from the Class are Defendants' officers and directors, Plaintiff's counsel, and any member of the judiciary presiding over this action.

2. Questions of law and/or fact are common to members of the Class, and predominate over any questions affecting only individual members, consistent with Fed. R. Civ. Pr. 23(b)(3).

3. Plaintiff's claims are typical of the claims of the other members of the Class.

4. Plaintiff will fairly and adequately represent the interests of the members of the

¹ Doe Defendants are defined in Plaintiff's Complaint. Plaintiff reserves his right to amend the above Class definitions and Motion as appropriate following discovery.

Class, and has retained counsel experienced in class action litigation.

5. Management of this case a class action does not present difficulties that would militate against class certification, and a class action is superior to alternative methods of adjudicating this dispute. While proceeding pursuant to Fed. R. Civ. Pr. 23 is economically feasible, individual cases are not and would needlessly waste judicial resources.

6. Additionally, class-wide injunctive relief is appropriate pursuant to Fed. R. Civ. Pr. 23(b)(2), as Defendants have acted or refused to act on grounds that apply generally to the Class.

7. Finally, this action is appropriately certified pursuant to Fed. R. Civ. Pr. 23(c)(4) with respect to particular issues, *e.g.*, so that the Class may obtain declaratory relief and/or notice thereof with respect to Defendants' alleged liability for the misconduct at issue in Plaintiff's Complaint.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that the Court grant this Motion for Class Certification, and certify the proposed Class, but that the Court enter and continue said Motion generally at this time in light of the status of this case, and provide such other and further relief it deems appropriate.

Respectfully submitted,

Stacy Hill, individually and on behalf of all similarly situated persons

By: /s/ Anita Dellaria
One of Plaintiff's Counsel

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